



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MAR 20 2000

Larry P. Weinberg, General Counsel
Robert D. Lenhard, Associate General Counsel
American Federation of State,
County & Municipal Employees
1101 17th St., N.W.
Suite 1210
Washington, D.C. 20036

RE: MUR 4762
American Federation of State,
County & Municipal Employees
American Federation of State,
County & Municipal Employees-PEOPLE
and William Lucy, as treasurer

Dear Messrs. Weinberg and Lenhard:

On June 23, 1998, the Federal Election Commission ("Commission") found reason to believe the American Federation of State, County & Municipal Employees violated 2 U.S.C. § 441b(a). On the same date, the Commission also found reason to believe the American Federation of State, County & Municipal Employees-PEOPLE and William Lucy, as treasurer ("AFSCME-PEOPLE"), violated 2 U.S.C. §§ 441b(a), 434(b), 441a(a)(2)(A) and 441a(a)(2)(C). After considering the circumstances of the matter, the Commission determined, on March 14, 2000, to take no further action against AFSCME-PEOPLE with regard to contributions it made to the Texas Democratic Party and affiliated county committees in 1996. The Commission reminds you that making excessive contributions to affiliated political party committees is a violation of 2 U.S.C. § 441a(a)(2)(C). Your clients should take steps to ensure this activity does not occur in the future.

With regard to the other violations for which the Commission made reason to believe findings, on March 14, 2000, the Commission instructed this Office to request additional information from you concerning the actual operation and costs of the telephone bank services operated by AFSCME that were used by AFSCME-PEOPLE for telephone calls in support of three candidates for federal office in 1996, and for which AFSCME-PEOPLE reimbursed AFSCME after the calls were made. Accordingly, we request that you describe in writing the telephone bank services provided for each day calls were made, including the number and type of telephone facilities provided (e.g., automated or manual); the number and employment affiliation of personnel involved in providing the services, including any payment arrangements; and any

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overhead items incidental to the provision of the services. We also request a breakdown of the reimbursement by costs, including but not limited to those associated with the phones, personnel and overhead. Please provide this information by close of business on Tuesday, March 28, 2000.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,



Susan L. Lebeaux
Assistant General Counsel

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